
Exhibit 4

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1
2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF MICHIGAN
4 SOUTHERN DIVISION

5 -----X
6 IN RE: US LLC MONOSTABLE ELECTRONIC
7 GEARSHIFT LITIGATION,

8 MDL NO. 2744

9
10 This Document Relates to:

11
12 SOPHIE MANNARINO and MICHAEL MENNA, as
13 Co-Administrators for the Estate of
14 MICHAEL J. MANNARINO, a/k/a MICHAEL J.
15 MANNARINO, JR.,

16 PLAINTIFFS,

17 -against- Case No.:
18 2:16-md-02744

19 FCA US LLC, ROCKAWAY CHRYSLER DODGE JEEP
20 RAM, ZF NORTH AMERICA, INC. and JOHN DOES
21 1-100,

22 DEFENDANTS.
23 -----X

24
25 (Caption Continued on Next Page.)

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DATE: February 3, 2020

3

TIME: 10:13 A.M.

4

5 DEPOSITION of the Non-Party
6 Witness, MALIK WRIGHT, taken by the
7 Respective Parties, pursuant to a Subpoena
8 and to the Federal Rules of Civil
9 Procedure, held at the offices of Diamond
10 Reporting, Inc., 16 Court Street, Brooklyn,
11 New York 11241 before Lynda Adam, a Notary
12 Public of the State of New York.

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1 WRIGHT

2 Brooklyn.

3 A. Yes.

4 Q. Do you have any recollection of
5 an incident on that date at that location,
6 9714 Seaview Avenue?

7 A. Yes.

8 Q. What can you tell us about what
9 you recall.

10 A. Yes, responding to the
11 accident, came over as a pedestrian struck,
12 but when we got there, there was a
13 gentleman lying in the middle of the road,
14 like, in the parking lot, --

15 Q. Right?

16 A. -- the asphalt.

17 Q. Right?

18 A. And bystanders -- you know, I
19 asked, interviewed several bystanders, and
20 asked if they had seen anything or -- I
21 asked the victim, I asked the guy -- you
22 know, the gentleman who was on the ground,
23 if -- what happened to him? He was unable
24 to really tell me what happened.

25 Q. All right.

1 WRIGHT

2 A. *Nobody said -- you know --*
3 *(indicating).* The bystanders nearby did
4 not see anything, they did not see what
5 happened. *Nobody could say what occurred.*

6 Q. All right.

7 A. You know, just called for an
8 ambulance, and got him on the ambulance,
9 and got him to the hospital.

10 Q. Okay.

11 A. His car was -- his car was --
12 in a parking spot, but it was -- on, and
13 it was in gear, and like -- in reverse,
14 like, and pressed up against another car.

15 Q. All right.

16 A. I went into the car, and -- put
17 it in gear, and I re-parked it, and turned
18 it off.

19 Q. Okay.

20 A. But it was several -- several
21 -- like, yards from him, away from him,
22 and -- yeah?

23 Q. Okay. Now, you gave us a lot
24 of information.

25 | I'm just going to break it down.

1 WRIGHT

2 Q. And then, at some point, do you
3 go over to his vehicle?

4 A. Yes.

5 Q. And does your partner stay with
6 Mr. Mannarino, at that point?

7 A. I believe so.

8 Q. Okay.

9 A. Yeah?

10 Q. Now, when you walked over to
11 his vehicle, did you look inside?

12 A. Yes.

13 Q. Did you observe any contents
14 inside the vehicle?

15 A. No? No, not that I can recall,
16 no.

17 Q. Was the engine running?

18 A. Yes, the vehicle was on.

19 Q. Do you recall whether there was
20 a key for the ignition, or whether it was a
21 push button?

22 A. I can't remember exactly.

23 Q. Okay.

24 A. I don't recall exactly.

25 Q. So after looking in the

1 WRIGHT

2 vehicle, did you do anything, before you
3 get into the driver's seat?

4 A. Not that I recall?

5 Q. Okay.

6 A. No.

7 Q. And how did you make the
8 determination that the vehicle was in
9 reverse?

10 A. The -- the motion that it was
11 -- it was going; it was like -- it was
12 trying to move backwards, like when it was
13 -- up against the other vehicle, it wasn't
14 trying to go forward, it was stuck, so --
15 (Indicating.) And the -- the door was
16 pressed up against it, so -- (Indicating.)

17 The door was stopping it from
18 continuing to move backwards.

19 So when I shifted it -- you
20 know, to straighten it out -- you know, I
21 took it out of that gear.

22 Q. All right. Now, do you recall
23 whether you had to -- do you recall
24 whether the parking brake was on when you
25 got into the vehicle?

WRIGHT

C E R T I F I C A T E

STATE OF NEW YORK)

: ss. :

COUNTY OF SUFFOLK)

I, LYNDA ADAM, a Notary Public for
and within the State of New York, do hereby
certify:

That the witness whose examination is hereinbefore set forth was duly sworn and that such examination is a true record of the testimony given by that witness.

I further certify that I am not related to any of the parties to this action by blood or by marriage and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 3rd day of February 2020.

Syndra Adams

LYNDA ADAM